

EXHIBIT A

Set forth below is the name and, to the extent known by the Commission, the address, phone number and/or email address of each individual currently known to the Commission who is likely to have discoverable information that the Commission may use to support its claims in this action other than for purposes of impeachment or as needed to authenticate documents. The Commission may learn during discovery of additional individuals within the scope of Rule

26(a)(1)(A)(i) and/or additional topics about which the individuals listed below have relevant knowledge, if necessary, will supplement these responses at the appropriate time.

Defendants in SEC v. Archer, et al.

Person or Entity	Contact Information	Relevant Knowledge
Jason Galanis	FCI Terminal Island Federal Correctional Institution PO Box 3007 San Pedro, CA 90733	Scheme to misappropriate the proceeds from the sale of the Wakpamni bonds, including the bonds' issuances, sales, transfers, use of proceeds; and payments of interest; payments made to or on behalf of scheme participants; acquisition of WAAG, Valor Life, NoRe Capital and BIISL and funding thereof; acquisitions of Hughes and AAM and funding thereof; Hughes and AAM operations, funding and management; acquisition of Burnham Financial Group, Burnham Securities, Inc. and Burnham Asset Management LLC by CORFA, BOE, Burnham Asset Management Holdings; IPO of Code Rebel; Investments by WAAG in Ballybunion, and by Valorlife in Wakpamni bonds; Ballybunion NV and Wealth Assurance NV formation and account openings and transactions; investments by scheme participants in MBloom entities; sales and efforts to sell Wakpamni bonds; use of Wakpamni bonds to support net capital of various entities; formation and purpose of Calvert entities.

John Galanis	RRM Long Beach Residential Reentry Office PO Box 323 San Pedro, CA 90733	Scheme to misappropriate the proceeds from the sale of the Wakpamni bonds; issuance of Wakpamni bonds; use of proceeds from issuances.
Devon Archer	c/o Matthew L. Schwartz, Esq. Boies Schiller Flexner 55 Hudson Yards 20 th Fl New York, NY 10001	Scheme to misappropriate the proceeds from the sale of the Wakpamni bonds, including the bonds' issuances, sales, transfers, use of proceeds; and payments of interest; payments made to or on behalf of scheme participants; acquisition of WAAG, Valor Life and BIISL and funding of Valor Life and BIISL acquisitions; acquisitions of Hughes and AAM and funding thereof; acquisition of Burnham Financial Group, Burnham Securities, Inc. and Burnham Asset Management LLC by CORFA, BOE, Burnham Asset Management Holdings LLC; loan from Valorlife to Burnham Asset Management Holdings LLC; IPO of Code Rebel; investments by scheme participants in MBloom entities; RSB transfers of Code Rebel shares to WAAG; efforts to sell Wakpamni bonds through or to Morgan Stanley; use of Wakpamni bonds to support the net capital of various entities; purchase of Wakpamni bonds by Condor Financial; creation and purpose of Calvert entities.
Bevan Cooney	c/o Matthew D. Umhofer, Esq.	Scheme to misappropriate the proceeds from the sale of

	<p>Spertus, Landes & Umhofer LLP 1990 S. Bundy Dr., Ste. 705 Los Angeles, CA 90025</p>	<p>the Wakpamni bonds, including the bonds' issuances, sales, transfers, use of proceeds; and payments of interest; payments made to or on behalf of scheme participants; acquisition of WAAG, Valor Life, NoRe Capital and BIISL, and funding of Valor Life and BIISL acquisitions; acquisitions of Hughes and AAM and funding thereof; IPO of Code Rebel; investments by scheme participants in MBloom entities; use of Wakpamni bonds to support the net capital of various entities; creation and purpose of Calvert entities; transfer of Wakpamni bond to Burnham Securities, Inc.</p>
Gary Hirst	<p>c/o Robert Knuts, Esq. Sher Tremonte LLP 90 Broad Street, 23rd Fl New York, NY 10004</p>	<p>Scheme to misappropriate the proceeds of the Wakpamni bonds, including the bonds' issuances, sales, transfers, use of proceeds; and payments of interest; payments made to or on behalf of scheme participants; acquisition of WAAG, Valor Life, New Olympia Re and BIISL and funding thereof; acquisitions of Hughes and AAM and funding thereof; acquisition of Burnham Financial Group, Burnham Securities, Inc. and Burnham Asset Management LLC by CORFA, BOE, Burnham Asset Management Holdings; IPO of Code Rebel; investments by</p>

		scheme participants in MBloom entities; sales and efforts to sell Wakpamni bonds; use of Wakpamni bonds to support net capital of various entities; New Olympia Re's ownership and investment in WAH Ltd. and VGL.
Hugh Dunkerley	21661 Brookhurst St., Apt. 162 Huntington Beach, CA 92646-8164	Scheme to misappropriate the proceeds from the sale of the Wakpamni bonds, including the bonds' issuances, sales, transfers, use of proceeds; and payments of interest; payments made to or on behalf of scheme participants; acquisition of WAAG, Valor Life and BIISL and funding thereof; Investments by WAAG in Ballybunion, and by Valorlife in Wakpamni bonds; acquisitions of Hughes and AAM and funding thereof; acquisition of Burnham Financial Group, Burnham Securities, Inc. and Burnham Asset Management LLC by CORFA, BOE, Burnham Asset Management Holdings; IPO of Code Rebel; investments by scheme participants in MBloom entities; sales of and efforts to sell Wakpamni bonds; use of Wakpamni bonds to support the net capital of various entities; creation and purpose of Calvert entities.; communications with WLCC; formation of Wealth Assurance Holdings, Ltd.

		(NV) and management of associated bank account.
Michelle Morton	235 Archangela Ave. Colonia, NJ 07067	Sale of the Wakpamni bonds to clients of Hughes and Atlantic; Wealth Assurance, Valorlife, and Burnham Securities Inc. management; acquisitions of Hughes and AAM and funding thereof; Hughes and AAM operations, funding and management; efforts to sell the Wakpamni bonds.
Francisco Martin	Francisco.martin@protonmail.ch	Issuances of Wakpamni bonds; PEM; investment in Code Rebel IPO; Thunder Valley Engineering and Seymour Capital formation and respective purchases of Code Rebel shares and distribution of proceeds; trading in Code Rebel stock by Thorsdale; transfer of Code Rebel shares to Bonwick; purchase of Wakpamni bonds by Condor Financial; creation and use of Colarisventures.com domain name; formation of Calvert.

Individuals Associated with Burnham Financial Group and Related Entities¹

Person or Entity	Contact Information	Relevant Knowledge
Jon Burnham	c/o Barry J. Friedberg, Esq. Trachtenberg Rosdes & Friedberg LLP 545 Fifth Avenue New York, NY 10017	Acquisition of Burnham Financial Group, Inc., by CORFA, BOE; acquisition of Burnham Asset Management Corp. by CORFA, BOE, Burnham Asset Management Holdings LLC; management of Burnham Financial Group, Inc.;

¹ In addition to Archer Defendants.

		placement of Wakpamni bonds; Code Rebel IPO; acquisition of Bonwick Capital Partners; use of the Wakpamni bond to support net capital of various entities; sale of Burnham Securities Inc. to Bonwick Capital Partners.
Andrew Godfrey	78 Hilltop Dr. Manhasset, NY 11030	Acquisition of Burnham Financial Group, Inc., by CORFA, BOE; acquisition of Burnham Asset Management Corp. by CORFA, BOE, Burnham Asset Management Holdings LLC; investment in CORFA; investment in BAM Holdings, LLC; management of Burnham Financial Group, Inc.; placement of Wakpamni bonds; loan from Valorlife to Burnham Asset Management Holdings LLC; Code Rebel IPO; acquisition of Bonwick Capital Partners; use of the Wakpamni bond to support net capital of various entities; sale of Burnham Securities Inc. to Bonwick Capital Partners; efforts to make interest payments on Wakpamni bonds by scheme participants.
Marcelle Devine	c/o Michelle Merola, Esq. Hodgson Russ LLP The Guaranty Building 140 Pearl Street Suite 100 Buffalo, NY 14202	Acquisition of Burnham Financial Group, Inc., by CORFA, BOE; acquisition of Burnham Asset Management Corp. by CORFA, BOE, Burnham Asset Management Holdings LLC; placement of Wakpamni bonds; Code Rebel IPO; acquisition of

		Bonwick Capital Partners; use of the Wakpamni bond to support net capital of various entities; sale of Burnham Securities Inc. to Bonwick Capital Partners.
Nolan Sheehan	459 Columbus Ave. Suite 121 New York, NY 10024	Compliance of Burnham Financial Group and related entities with applicable regulatory requirements.
Margaret M. Eisen	c/o Mary Moynihan, Esq. Perkins Coie 700 13 th Street, NW Suite 800 Washington, D.C. 20005	Acquisition of Burnham Asset Management Corp. by CORFA, BOE, Burnham Asset Management Holdings LLC
William F. Connell	c/o Mary Moynihan, Esq. Perkins Coie 700 13 th Street, NW Suite 800 Washington, D.C. 20005	Acquisition of Burnham Asset Management Corp. by CORFA, BOE, Burnham Asset Management Holdings LLC.
Bruce MacCorkindale	Perkins Coie 700 13 th Street, NW Suite 800 Washington, D.C. 20005	Acquisition of Burnham Asset Management Corp. by CORFA, BOE, Burnham Asset Management Holdings LLC.
Mary Moynihan	c/o Mary Moynihan, Esq. Perkins Coie 700 13 th Street, NW Suite 800 Washington, D.C. 20005	Acquisition of Burnham Asset Management Corp. by CORFA, BOE, Burnham Asset Management Holdings LLC.
Daniel McClory	37 Cardiff Laguna Niguel, CA 92677	Activities of Burnham Securities, Inc. and acquisition of Burnham Financial Group by CORFA.
Anthony Lacavera		Acquisition of Burnham Financial Group by CORFA.
Larry Liu	larryliu@globallawoffice.com.cn	Acquisition of Burnham Financial Group by CORFA.
Elizabeth Sugarman	Steven Goldsobel, Esq. c/o Law Office of Steven Goldsobel 1901 Avenue of the Stars, Uite 1750	Investment in WAH Ltd.; investment in Valor Group Ltd. Class B Shares; investment in CORFA and CORFA acquisition of

	Los Angeles, CA 90067	Burnham Financial Group, Inc.; assumption of VL Assurance loan to Merriman Holdings through EGS LLC; assumption of VL Assurance loan to Valor Group Ltd.; investments by Lausanne.
Nurlan Abduov	nurlan@abduov.com	Investment in CORFA; acquisition of Burnham Financial Group, Inc.; investment in BAM Holdings, LLC.
Devin Wicker	Devin.wicker@gmail.com	Sale and purchase of Wakpamni bonds; AAM management; loan to Bonwick Capital Partners from VL Assurance; acquisition of Bonwick Capital Partners by Burnham Financial Group; acquisition of Burnham Securities, Inc. by Bonwick Capital Partners.
Rashaun Williams	rashaunlw@gmail.com	Sale and purchase of Wakpamni bonds; AAM management; loan to Bonwick Capital Partners from VL Assurance; acquisition of Bonwick Capital Partners by Burnham Financial Group; acquisition of Burnham Securities, Inc. by Bonwick Capital Partners.

Investors and Potential Investors in Wealth Assurance Holdings Ltd and Related Entities²

Person or Entity	Contact Information	Relevant Knowledge
Elizabeth Sugarman	c/o Steven Goldsobel, Esq. c/o Law Office of Steven Goldsobel 1901 Avenue of the Stars, Uite 1750	Investment in WAH Ltd.; investment in Valor Group Ltd. Class B Shares; investment in CORFA and CORFA acquisition of

² In addition to relevant Archer Defendants.

	Los Angeles, CA 90067	Burnham Financial Group, Inc.; assumption of VL Assurance loan to Merriman Holdings through EGS LLC; assumption of VL Assurance loan to Valor Group Ltd.; investments by Lausanne; investments by Kona Seascape Development LLC; investment in Code Rebel IPO.
Elliott Broidy	c/o Christopher Clark, Esq. Latham & Watkins LLP 1271 Avenue of the Americas New York, NY 10020	Transactions with Jason Sugarman, including Sugarman investment in Threat Deterrence and possible investment by Broidy in WAH Ltd.
George Baker	c/o David Wiechert, Esq. 27136 Paseo Espada Suite B1123 San Juan Capistrano, CA 92675	Catalyst investments in WAH Ltd.; CORFA; Code Rebel IPO; ownership of Catalyst.
Adam Levin	c/o Vert Capital 10951 W. Pico Blvd. Ste. 204 Los Angeles, CA 90064	Investment in WAH, Ltd.
Michael Pope	c/o Vert Capital 10951 W. Pico Blvd. Ste. 204 Los Angeles, CA 90064	Investment in WAH, Ltd.
Edward M. Czuker	c/o Christopher Heck, Esq. Wolf, Rifkin, Shapiro, Schulman & Rabkin LLP 11400 W. Olympic Blvd., 9 th Fl Los Angeles, CA 90064	Investment in WAH, Ltd.
David Ezekiel	c/o Patricia A. Pileggi, Esq. Arent Fox Schiff 1301 Avenue of the Americas, 42 nd Fl New York, NY 10019	Investment in WAH, Ltd.; acquisition of BIISL; Ballybunion investment; loan to Burnham Securities, Inc.; loans to Valor Group, Ltd., Inversiones Balesia and Luxury Asset Lending by VL Assurance; VL Assurance investment in Code Rebel stock; efforts to sell WAAG and Valorlife; interactions with FMA and BMA;

		interactions with AAM sellers; interactions with SEC; communications with WLCC; investments by Shalfleet.
John Greenwood	San Salvatore, Flat 6 Alfred Gauci Street St. Julian's STJ 1180 Malta john@natprov.com	Acquisition of Valor Group Ltd. Class B Shares; interest in Thunder Valley Engineering Ltd. and its investment in Code Rebel; New Olympia Re's ownership and investment in WAH Ltd. and VGL; VL Assurance acquisition of New Olympia Re.

Individuals Associated with Wealth-Assurance AG and Related Entities³

Person or Entity	Contact Information	Relevant Knowledge
Aloyse Steichen	85, rue des Maraichers L-2124 Luxembourg	Acquisition of WAAG by WAH Ltd.; Ballybunion investment; acquisition of Valorlife; management of WAAG and Valorlife; purchase of Wakpamni bond; acquisitions of Hughes and AAM.
Rory Knight	roryknight@oxfordmetrica.com	Acquisition of WAAG by WAH Ltd.; Ballybunion investment; acquisition of Valorlife; management of WAAG and Valorlife; purchase of Wakpamni bond; acquisitions of Hughes and AAM; transfer by RSB of Code Rebel shares to WAAG.
David Ezekiel	c/o Patricia A. Pileggi, Esq. Arent Fox Schiff 1301 Avenue of the Americas, 42 nd Fl New York, NY 10019	Investment in WAH, Ltd.; acquisition of BIISL; Ballybunion investment; loan to Burnham Securities, Inc.; loans to Valor Group,

³ In addition to relevant Archer Defendants.

		Ltd., Inversiones Balesia and Luxury Asset Lending by VL Assurance; VL Assurance investment in Code Rebel stock; VL Assurance acquisition of New Olympia Re; efforts to sell WAAG and Valorlife; interactions with FMA and BMA; interactions with AAM sellers; interactions with SEC; communications with WLCC; preservation of the documents maintained by the Valor Entities.
Mark Waddington	c/o Patricia A. Pileggi, Esq. Arent Fox Schiff 1301 Avenue of the Americas, 42 nd Fl New York, NY 10019	Acquisition of BIISL; Ballybunion investment; loan to Burnham Securities, Inc.; loans to Valor Group, Ltd., Inversiones Balesia and Luxury Asset Lending by VL Assurance; VL Assurance investment in Code Rebel stock; VL Assurance acquisition of New Olympia Re; efforts to sell WAAG and Valorlife; interactions with FMA and BMA.
Elzbieta Sotbarn	c/o Patricia A. Pileggi, Esq. Arent Fox Schiff 1301 Avenue of the Americas, 42 nd Fl New York, NY 10019	Investments by WAAG in Ballybunion, and by Valorlife in Wakpamni bonds; operation of Lichtenstein insurers; loan to Burnham Asset Management Holdings LLC; acquisitions of Hughes and AAM; transfer by RSB of Code Rebel shares to WAAG.
Luca Uehlinger	c/o Patricia A. Pileggi, Esq. Arent Fox Schiff	Investments by WAAG in Ballybunion, and by

	1301 Avenue of the Americas, 42 nd Fl New York, NY 10019	Valorlife in Wakpamni bonds; acquisition of Valorlife; operation of Lichtenstein insurers; loan to Burnham Asset Management Holdings LLC; acquisitions of Hughes and AAM; transfer by RSB of Code Rebel shares to WAAG; communications with representatives of WLCC.
Louis Zuckerbraun	c/o Patricia A. Pileggi, Esq. Arent Fox Schiff 1301 Avenue of the Americas, 42 nd Fl New York, NY 10019	Acquisition of BIISL/VL Assurance; investment in Ballybunion.

Individuals Associated with Jason Sugarman and Related Entities⁴

Person or Entity	Contact Information	Relevant Knowledge
Michael Sugarman	Michael.sugarman@stjoe.org	Investment in Code Rebel IPO
Jeff Seabold	c/o Kristin N. Tahler, Esq. Quinn Emanuel Urquhart & Sullivan, LLP 865 S. Figueroa Street, 10th Floor Los Angeles, CA 90017 213-443-3615 Direct	Ownership, control and operation of Camden Entities, including Camden Escrow
Elmira Ukubaeva	Elmira@camdencap.com	Escrow for 1920 Bel Air transaction; ownership, control and operation of Camden Entities, including Camden Escrow.
Maria Santana	Camden Escrow 9595 Wilshire Blvd., #701 Beverly Hills, CA 90212	Escrow for 1920 Bel Air transaction, ownership, control and operation of Camden Entities, including Camden Escrow.

⁴ In addition to Archer Defendants, and other individuals listed above.

Matthew Nordgren	c/o Jeffrey Rutherford, Esq. Kendall Brill & Kelly LLP 10100 Santa Monica Boulevard, Suite 1725 Los Angeles, CA 90067	Ballybunion Nevada formation, account openings, transactions, and reporting of NAV; sale of investments in WAH, Ltd.; Code Rebel IPO; purchase of Wakpamni bond by Condor Financial.
Lucas Mann	c/o Erik S. Groothuis, Esq. Schlam Stone & Dolan LLP 26 Broadway New York, NY 10004	Ballybunion Nevada and Thorsdale account openings and transactions; Thorsdale management; proposed sale of Wakpamni bonds through or to Morgan Stanley.
Carlos Velasquez	carlos@coradv.com	Creation of COR website.
Heidi Planck Wayne		Documents maintained by Sugarman and Camden Entities and the preservation thereof.
George Alvarez	c/o Michael Lipman, Esq. Duane Morris LLP 750 B Street, Suite 2900 San Diego, CA 92101-4681	Loan to Inversiones Balesia and Valor Group, Ltd. from VL Assurance.
Mario Alvarez	malvarez@konabeachbungalows.com	Loan to Inversiones Balesia and Valor Group, Ltd. from VL Assurance.
Todd Binder	Tdm18@yahoo.com	Loan to Inversiones Balesia and Valor Group, Ltd. from VL Assurance.
Ken Hobbs	khobbs@itocsa.com	Loan to Inversiones Balesia and Valor Group, Ltd. from VL Assurance; loan from Ballybunion to Cor Financial Holdings (HK).
Jason D. Turner	jturner@venbrook.com	Investment in Code Rebel IPO; Investment in and ownership of NoRe.
Brian Quinn	brian@netgain-financial.com	VL Assurance loan to Luxury Asset Lending.
Brennan Family Trust	c/o James Brennan james@ehgrp.com	Loan to Jason Galanis, Sugarman and Cooney

		and repayment by WAH Ltd.
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Individuals Associated with Hughes Capital and AAM⁵

Person or Entity	Contact Information	Relevant Knowledge
Richard Deary	rdeary@nc.rr.com	Sale of the Wakpamni bonds to clients of Hughes and Atlantic; Wealth Assurance, Valorlife, and Burnham Securities Inc. management; acquisitions of Hughes and AAM and funding thereof; funding of Hughes and AAM operations; Hughes and AAM management; efforts to sell the Wakpamni bonds.
Donald Trotter	1000 W. 57 th Street Kansas City, MO 64113	Placement of the Wakpamni bonds in April 2015; management of AAM.
Dina Clements	101 Washington Blvd., #1100 Stamford, CT 06902	Placement of the Wakpamni bonds in April 2015; management of AAM.
Ronald Sellers	c/o Jonathan Bach, Esq. Shapiro Arato Bach LLP 500 Fifth Avenue, 40 th Fl New York, NY 10110	Acquisition of AAM by GMT Duncan and WAH, Ltd. guaranty; placement of the Wakpamni bonds.
Joshua Bogart	Prism Global Management LLC 15 Creemer Road Armonk, NY 10504	Acquisition of AAM by GMT Duncan and WAH, Ltd. guaranty.
Frankie Hughes	1162 North Pitt Street Alexandria, VA 22314	Acquisition of Hughes by GMT Duncan; placement of the Wakpamni bonds.
Daniel Turney	3117 Ravensworth Place Alexandria, VA 22302	Placement of the Wakpamni bonds in August 2014; management of Hughes Capital Management.
Carolyn Lisa	2151 Jamieson Avenue Alexandria, VA 22314	Placement of the Wakpamni bonds in August 2014; management of Hughes Capital Management.

⁵ In addition to Archer Defendants, and other individuals listed above.

Individuals Associated with Code Rebel, MBloom Fund I LLP and Related Entities⁶

Person or Entity	Contact Information	Relevant Knowledge
Arben Kryeziu	c/o Mitchell Kulick, Esq. Feuerstein Kulick 420 Lexington Ave., Ste 2024 New York, NY 10170 and Jay Musoff, Esq. Loeb & Loeb 345 Park Ave. New York, NY 10154	Code Rebel management and IPO; investments by Sugarman, Archer and Thorsdale in Code Rebel and MBloom entities.
Petra Grimm	3810 Lepo Street Haiku, Hawaii 96708	Code Rebel management and IPO.
Reid Dabney		Code Rebel management and IPO.

Attorneys Retained in Connection with Various Aspects of the Wakpamni Scheme

Person or Entity	Contact Information	Relevant Knowledge
Timothy Anderson	c/o Linda Dale Hoffa, Esq. Dilworth Paxson LLP 1500 Market St., Suite 3500E Philadelphia, PA 19102	Issuance of Wakpamni bonds; sale of Wakpamni bonds to WAAG; use of Wakpamni bonds to support net capital of various entities.
Stephen A. Weiss	c/o Larry Krantz, Esq. Krantz & Berman 747 Third Ave., 32 nd Fl New York, NY 10017	Acquisition of WAAG and funding thereof; acquisition of Burnham Financial Group Inc. by CORFA, BOE; acquisition of Burnham Asset Management Corp. by CORFA, BOE, Burnham Asset Management Holdings LLC; acquisition of Hughes Capital Management; negotiations to acquire AAM; Code Rebel IPO.
Spencer Feldman	Olshan Frome Wolosky LLP 1325 Avenue of the Americas New York, NY 10019	Code Rebel IPO; acquisition of AAM by GMT Duncan; AAM operations, funding and management.
Clifford Wolff	c/o Chuck Clayman, Esq. Ramsey C. Hinkle, Esq.	Funds disbursed through law firm trust account on behalf

⁶ In addition to Archer Defendants, and other individuals listed above.

	Clayman & Rosenberg LLP 305 Madison Avenue New York, NY 10165	of Thorsdale, Sugarman, Galanis, Archer, Cooney and others; legal work related to acquisition of Bonwick by Burnham Financial Group; production of documents received from Cooney to SEC.
Daniel D. White	deceased	Disbursal of funds received on behalf of Sugarman and directed to Sugarman's, Elizabeth Sugarman's and Lausanne's creditors and associates or associated entities; business affairs of Jason Sugarman, Jason and Elizabeth Sugarman, Elizabeth Sugarman and Lausanne.
Sharon Sung		Disbursal of funds received on behalf of Sugarman and directed to Sugarman's, Elizabeth Sugarman's and Lausanne's creditors and associates or associated entities; business affairs of Jason Sugarman, Jason and Elizabeth Sugarman, Elizabeth Sugarman and Lausanne; preservation of Jason Sugarman's and Camden Entities' files.
Jan Greer		Disbursal of funds received on behalf of Sugarman and directed to Sugarman's, Elizabeth Sugarman's and Lausanne's creditors and associates or associated entities; business affairs of Jason Sugarman, Jason and Elizabeth Sugarman, Elizabeth Sugarman and Lausanne; preservation of Jason Sugarman's and Camden Entities' files.

Steven A. Horowitz	Horowitz and Rubenstein 200 S. Service Road, Suite 104 Roslyn Heights, NY	Code Rebel deposit with Thorsdale; distribution of monies on behalf of Jason Galanis; VL Assurance insurance policies and deposits.
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Individuals Associated with Morgan Stanley

Person or Entity	Contact Information	Relevant Knowledge
Catherine Driever	c/o Christopher Conniff, Esq. Mary Brust, Esq. Ropes & Gray 1211 Avenue of the Americas New York, NY 10036	Account management for Devon Archer, Rosemont Seneca Bohai, LLC, Archer Diversified Investments LLC, RSB LLC, and Burnham Securities, Inc.
Kyle Wool	c/o Christopher Conniff, Esq. Mary Brust, Esq. Ropes & Gray 1211 Avenue of the Americas New York, NY 10036	Account management for Devon Archer, Rosemont Seneca Bohai, LLC, Archer Diversified Investments LLC, RSB LLC, and Burnham Securities, Inc.
Iris Gomez	c/o Christopher Conniff, Esq. Mary Brust, Esq. Ropes & Gray 1211 Avenue of the Americas New York, NY 10036	Account management for Devon Archer, Rosemont Seneca Bohai, LLC, Archer Diversified Investments LLC, RSB LLC, and Burnham Securities, Inc.
Jerome Niles	c/o Christopher Conniff, Esq. Mary Brust, Esq. Ropes & Gray 1211 Avenue of the Americas New York, NY 10036	Account management for VL Assurance, Devon Archer, Rosemont Seneca Bohai, LLC, Archer Diversified Investments LLC, RSB LLC, and Burnham Securities, Inc.
Joseph Fereno	c/o Christopher Conniff, Esq. Mary Brust, Esq. Ropes & Gray 1211 Avenue of the Americas New York, NY 10036	Account management for VL Assurance, Devon Archer, Rosemont Seneca Bohai, LLC, Archer Diversified Investments LLC, Burnham Securities, Inc. Jason Sugarman, and

		Elizabeth Guber Sugarman.
Matt D'Emic	c/o Christopher Conniff, Esq. Mary Brust, Esq. Ropes & Gray 1211 Avenue of the Americas New York, NY 10036	Review of Archer's accounts at Morgan Stanley, securities held in those accounts, and transactions in those securities.
Brent Sheehan	c/o David Colapinto, Esq. Kohn, Kohn & Colapinto, LLP 1710 N St. NW Washington, D.C. 20036	Proposed sale of Wakpamni bond through MS.
Brian Connery	c/o Amianna Stovall, Esq. Hallie Noecker, Esq. Constantine Cannon 4 Embarcadero Center, 14 th Fl San Francisco, CA 94111	Proposed sale of Wakpamni bond through MS.
Eugene Schatz	c/o Christopher Conniff, Esq. Mary Brust, Esq. Ropes & Gray 1211 Avenue of the Americas New York, NY 10036	Account management for Devon Archer, Rosemont Seneca Bohai, LLC, and Archer Diversified Investments LLC.
Maggie Fiore	c/o Christopher Conniff, Esq. Mary Brust, Esq. Ropes & Gray 1211 Avenue of the Americas New York, NY 10036	Account management for Devon Archer, Rosemont Seneca Bohai, LLC, and Archer Diversified Investments LLC.
Samuel Buxton	c/o Christopher Conniff, Esq. Mary Brust, Esq. Ropes & Gray 1211 Avenue of the Americas New York, NY 10036	Account management for VL Assurance, Devon Archer, Rosemont Seneca Bohai, LLC, Archer Diversified Investments LLC, Burnham Securities, Inc. Jason Sugarman, Elizabeth Guber Sugarman; and David Ezekiel.
Michael Darling	c/o Christopher Conniff, Esq. Mary Brust, Esq. Ropes & Gray 1211 Avenue of the Americas New York, NY 10036	Account management for VL Assurance, Devon Archer, Rosemont Seneca Bohai, LLC, Archer Diversified Investments LLC, Burnham Securities, Inc. Jason Sugarman, Elizabeth Guber

		Sugarman; and David Ezekiel.
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Investors in Wakpamni Bonds (excluding Condor Financial/Francisco Martin)

Person or Entity	Contact Information	Relevant Knowledge
Atlantic Global Yield Opportunity Fund, LP Omaha School Employees Retirement System	OSERS 3215 Cuming Street Omaha, NE 68131-2024	Investment in Wakpamni bonds.
Birmingham Water Works Board	Birmingham Water Works 3600 First Avenue North P.O. Box 830110 Birmingham, AL 35283-0110 Attn: Michael Johnson & Macaroy Underwood	Investment in Wakpamni bonds.
Chicago Transit Authority Retiree Healthcare Trust	Chicago Transit Authority 10 South LaSalle Street Suite 1100 Chicago, IL 60603	Investment in Wakpamni bonds.
Management – ILA Managed Health Care Trust Fund	Management – ILA Managed Health Care Trust Fund 111 Broadway, 5 th Fl New York, NY 10006 Attn: Laverne Thompason	Investment in Wakpamni bonds.
Michelin North America, Inc. Master Trust	Michelin One Parkway South P.O. Box 19001 Greenville, SC 29602-9001 Attn: Cliff Moore	Investment in Wakpamni bonds.
Pension Trust for the Milk Drivers and Dairy Employees Local Union No. 246	Milk Driver's Local 246 911 Ridgebrook Road Sparks, MD 21152-9451 Attn: Wendy Chambers & Jennifer Carroll	Investment in Wakpamni bonds.
Philadelphia Housing Authority	Philadelphia Housing Authority 12 South 23rd Street Philadelphia, PA 19103 Attn: Raymond Ruocchio	Investment in Wakpamni bonds.

Richmond Retirement System	Richmond Retirement System 730 E. Broad Street, Suite 900 Richmond, VA 23219 Attn: Leo Griffin	Investment in Wakpamni bonds.
Terrapin Insurance Company	Terrapin Insurance Company 250 W. Pratt Street Suite 1200 Baltimore, MD 21201 Attn: Beth Walter	Investment in Wakpamni bonds.
Washington Suburban Sanitary Commission Employees Retirement Plan	Washington Suburban Sanitary Commission 14501 Sweitzer Lane Laurel, MD 20707	Investment in Wakpamni bonds.

Individuals Associated with the Wakpamni Lake Community Corporation

Person or Entity	Contact Information	Relevant Knowledge
Raycen Raines	c/o Troy Eid, Esq. Greenberg Traurig LLP 1144 15 th Street Suite 3300 Denver, CO 80202	Issuance of Wakpamni bonds.
Steven Haynes	steven@haynesinvestments.net	Issuance of Wakpamni bonds.
Geneva Lone Hill	c/o Troy Eid, Esq. Greenberg Traurig LLP 1144 15 th Street Suite 3300 Denver, CO 80202	Issuance of Wakpamni bonds.
Sandy Two Lance	c/o Troy Eid, Esq. Greenberg Traurig LLP 1144 15 th Street Suite 3300 Denver, CO 80202	Issuance of Wakpamni bonds.
Wilma Standing Bear	c/o Troy Eid, Esq. Greenberg Traurig LLP 1144 15 th Street	Issuance of Wakpamni bonds.

	Suite 3300 Denver, CO 80202	
Deb Blue Bird	c/o Troy Eid, Esq. Greenberg Traurig LLP 1144 15 th Street Suite 3300 Denver, CO 80202	Issuance of Wakpamni bonds.

Individuals Associated with US Bank

Person or Entity	Contact Information	Relevant Knowledge
Keith Henselen	c/o Richard G. Wilson, Esq. Maslon, LLC 3300 Wells Fargo Center 90 S. Seventh Street Minneapolis, MN 55402	Issuance and administration of Wakpamni bonds as representative of Indenture Trustee.

Individuals Associated with Banc of California

Person or Entity	Contact Information	Relevant Knowledge
Tina Van der Zee	c/o Mark McDonald, Esq. Morrison Foerster LLP 707 Wilshire Boulevard Los Angeles, CA 90017	Opening and account management of Ballybunion, Thorsdale, and Dunkerley-related accounts at Banc of California.
Richard Smith	c/o Mark McDonald, Esq. Morrison Foerster LLP 707 Wilshire Boulevard Los Angeles, CA 90017	Account management of Ballybunion and Thorsdale accounts at Banc of California.
Warren Paez	c/o Mark McDonald, Esq. Morrison Foerster LLP 707 Wilshire Boulevard Los Angeles, CA 90017	Opening and account management of Dunkerley-related accounts at Banc of California.

Others

Person or Entity	Contact Information	Relevant Knowledge
Persons associated with Goren Marcus Masino & Marsh, including: Jan Goren Jessica Goren	c/o Mark Beck, Esq. Mark Beck Law, PC 350 W. Colorado Boulevard, Suite 200 Pasadena, CA 91105	Accounting and business management for Jason and Elizabeth Sugarman and related entities and partnerships; audit for Wealth

Jessica Fieldman Mickella Kim Brenda Marsh Gary Masino Maria Ng Jonathan Nunnally Diana Volkenant Dayro Villamil		Assurance Holdings, Ltd. (BVI).
Persons associated with PwC Bermuda, including: Stewart Ritchie Colm Homan		Audit of VL Assurance.
Persons associated with PwC AG (Zurich), including: Enrico Strozzi Christian Konopka		Audit of Valor Group Ltd.
Persons associated with Blatt & Dauman, LLP	Abbey E. Blatt Blatt & Dauman, LLP 350 Motor Pkwy., Suite 308 Hauppauge, NY 11788	Compilation Report of WAPCC
Sebastian Momtazi	c/o Silvia L. Serpe, Esq. Serpe LLC 16 Madison Square West New York, NY 10010	Archer's business affairs.

B. Documents

Set forth below is a description by category of all documents, electronically stored information and tangible things, excluding privileged or otherwise undiscoverable material, and documents filed on the public docket in various associated litigated matters, that are currently in the Commission's possession, custody or control and were collected in the course of the investigation of this matter, captioned In the Matter of Hughes Capital Management LLC (NY-9298), and that the Commission may use to support its claims in this action other than for purposes of impeachment. These documents are located at the offices of the United States Securities and Exchange Commission, New York Regional Office, 100 Pearl Street, New York, New York. The Commission may learn during discovery of additional documents within the

scope of Rule 26(a)(1)(A)(ii) and, if necessary, will supplement these responses at the appropriate time:

Testimony transcript of Keith Henselen, dated May 6, 2016.

Various website captures of relevant entities' websites.

Tips, complaints and referrals.

Exhibits entered into evidence at, and testimony transcripts of, the trial in United States v. Galanis, et al., 16 Cr. 371 (RA)(S.D.N.Y.)

Document productions (which include email, spreadsheets, web postings, correspondence, invoices and brokerage, telephone, corporate and bank records) from the following persons and entities, and persons and entities associated or affiliated with the following entities:

1. Defendant
2. Alvarez, George
3. American Savings Bank
4. Anderson, Timothy
5. Archer, Devon
6. Asbury Automotive Group, Inc.
7. AT&T
8. Atlantic Asset Management⁷
9. Banc of California
10. Bentley Financial Services

⁷ Atlantic Asset Management, by its Receiver, additionally turned over to the Commission various laptops, media storage devices and a server, removed from the offices of Atlantic Asset Management, which are housed at a Commission off-site storage facility.

11. Beverley Loan Company
12. Biden, Hunter
13. Bonwick Capital
14. Bourgeois, J. Ben
15. British Virgin Islands Financial Services Commission
16. Burnham Asset Management⁸
17. Burnham Securities Inc.
18. Camden Capital Partners
19. Camden Real Estate Opportunity Fund
20. Capital One
21. Catalyst International
22. Century Investments
23. Citibank
24. City National Bank
25. CKR Law
26. The Clifford Wolff Law Firm
27. Code Rebel Corporation
28. Cooney, Bevan
29. COR Capital
30. COR Securities Holding, Inc.

⁸ Some portion of these documents, and of those produced by Burnham Securities, in connection with the winding up of their respective operations, were produced in SEC v. Archer, 16 Civ. 3505 (GHW)(OTW) pursuant to Stipulations and Orders, entered June 5, 2018 (DE 165), and June 6, 2018 (DE 169), that govern the production, if any, of such documents in this action.

31. Dilworth Paxson
32. DTCC
33. Federal Reserve Bank of New York
34. Fulton & Meyer
35. GoDaddy.com
36. Godfrey, Andrew
37. Goren Marcus Masino & Marsh LLP
38. Greenville (S.C.) Automotive
39. Grimm, Petra
40. Haynes Investments, LLC
41. Herrick Feinstein LLP
42. Hunter Taubman, Fischer & Li, LLC
43. Hughes Capital Management
44. Intel Corporation
45. Interactive Brokers, LLC
46. J. Ben Bourgeois
47. J.P. Morgan Chase
48. L.A. Restoration and Design, Inc.
49. Lausanne LLC
50. Lichter Yu LLP
51. Lincoln National Life Insurance
52. Lone Oak Fund
53. Luxury Asset Lending

- 54. Mann, Lucas
- 55. Martin, Francisco
- 56. Michelin
- 57. Momtazi, Sebastian
- 58. Morton, Michelle
- 59. Morgan Stanley Smith Barney LLC
- 60. Murray Analytics
- 61. My Alarm Center
- 62. Nathaniel, Peter
- 63. National Life Insurance Co.
- 64. Nationwide Insurance
- 65. Nicole Fuller Interiors
- 66. Olshan Frome Wolosky
- 67. Omaha School Employees Retirement System
- 68. Pershing LLC
- 69. PNC Bank
- 70. Richerson, Timothy
- 71. Richmond Retirement Systems
- 72. Rosemont Seneca Partners
- 73. Sellers, Ronald
- 74. Smarsh, Inc.
- 75. Sovereign Nations Development Corp.
- 76. TD Ameritrade

- 77. TD Bank
- 78. Thorsdale Fiduciary & Guaranty Co. Ltd.
- 79. Threat Deterrence
- 80. TIAA-CREF
- 81. United Security Funding, Inc.
- 82. U.S. Attorneys Office – SDNY
- 83. U.S. Bank, N.A.
- 84. Valley National Bank
- 85. Valor Group, Ltd.
- 86. Voya Financial
- 87. Wakpamni Lake Community Corp.
- 88. Weiss, Stephen
- 89. Wealth Assurance Private Client Corp.
- 90. Wells Fargo Bank
- 91. Wilson-Davis & Co. Securities
- 92. Wings Air Helicopters LLC
- 93. Documents supplied by foreign regulatory authorities, including the Bermuda Monetary Authority, British Virgin Islands FSC and the Liechtenstein FMA.

C. Damages

As to monetary relief, Plaintiff seeks disgorgement of any ill-gotten gains derived by Defendant from the conduct alleged in the Complaint, plus prejudgment interest on these amounts, pursuant to Sections 21(d)(5) and 21(d)(7) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. §§ 78u(d)(5) and (d)(7). Plaintiff also seeks civil penalties

pursuant to Section 20(a) of the Securities Act of 1933, 15 U.S.C. §77t(d); and Section 21(d)(3) of the Exchange Act, 15 U.S.C. § 78u(d)(3).

Dated: New York, New York
April 27, 2022

Respectfully submitted,

SECURITIES AND EXCHANGE
COMMISSION

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Mariel Bronen

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Attorneys for Plaintiff Securities and
Exchange Commission